

Exhibit 6

From: [Christopher Geddis](#)
To: [Bonner, Kelly](#); [Cheryll Calderon](#)
Cc: [Goldberg, Seth A.](#); [Bazan, Rebecca](#); [Priselac, Jessica](#); [Hill, Coleen W.](#); [Adam Slater](#)
Subject: RE: Valsartan MDL: ZHP Parties" Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen
Date: Monday, July 12, 2021 11:31:00 AM

Kelly,

That time works for us.

Thanks,
Chris

From: Bonner, Kelly <KABonner@duanemorris.com>
Sent: Sunday, July 11, 2021 9:09 PM
To: Christopher Geddis <CGeddis@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>
Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>
Subject: RE: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen

Counsel,

We consent to Plaintiffs' request for an extension to file an opposition to the ZHP Parties' motion to seal to August 9 to accommodate your team's vacation schedules.

We propose 3:30pm for a meet and confer. If that time works, please use the following dial-in:

1-877-211-3621;
Participant Passcode: 8635309613;
Moderator: 6088605581

Thank you,
Kelly

Kelly A. Bonner
Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Friday, July 9, 2021 3:02 PM

To: Bonner, Kelly <KABonner@duanemorris.com>; Cheryll Calderon <ccalderon@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca

<REBazan@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W.

<CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>

Subject: RE: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen

Kelly,

Plaintiffs disagree with your understanding of the Confidentiality and Protective Order, ZHP's obligations thereunder, as well as the reasonableness of Plaintiffs' position in the context of the Court's prior order, which denied ZHP's motion to seal twenty-four of the twenty-nine documents at issue. Your reference to the ten days to meet and confer applies to both parties. Plaintiffs reached out first to clarify their position on this filing, which focuses almost entirely on documents Plaintiffs have already challenged. The "completion of briefing" clearly refers to the Parties' briefs, not the Court's decision on the issue(s). In fact, in its decision on this issue, the Court quoted from or described Exhibits C, G, O, U, and W (all filed under seal in accordance with their confidentiality at that time), indicating that ZHP's confidentiality designations continue to be extremely overreaching and unjustified.

That said, Plaintiffs consent to extending ZHP's deadline to file a motion to seal this brief (ECF 1298) and Exhibits JJ, KK, and LL to July 22, 2021, with Plaintiffs' opposition due August 9, 2021, instead of August 2, 2021, to account for some of their team members' previously scheduled vacations. The Court has obviously ordered briefing on ZHP's waiver of the confidentiality of earlier filings that contain the remaining exhibits, to the extent the Court has not already ruled on their confidentiality (rulings, once again, that Plaintiffs are not challenging). To be clear, Plaintiffs are not consenting to extending ZHP's deadlines regarding any of those earlier filings, including their exhibits, and the subsequent filing of a document does not change the deadline for moving to seal earlier filings.

As you requested, Plaintiffs are available to meet and confer regarding the brief and three exhibits on Monday after 2:00 p.m. ET. Please advise what time works best for you and circulate a call-in number.

Best,
Chris

From: Bonner, Kelly <KABonner@duanemorris.com>

Sent: Friday, July 9, 2021 1:46 PM

To: Christopher Geddis <CGeddis@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca

<REBazan@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W.

<CWHill@duanemorris.com>

Subject: FW: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude

the Deposition of President Baohua Chen

Importance: High

Counsel,

Again, we flatly reject Plaintiffs' contention that the ZHP Parties waived confidentiality as to any documents, let alone those listed below, and we reserve our rights with respect to the confidentiality of those documents. This issue is the subject of court-ordered briefing.

Plaintiffs' position regarding the deadline for the motion to seal is without basis. Paragraph 31 provides that within ten (10) business days of the completion of briefing relating to the filing, the parties shall meet and confer to determine whether they can agree on non-confidential or redacted exhibits. If the parties are unable to reach an agreement, then the designating party must file a motion to seal within thirty days of the completion of briefing relating to the original motion.

Plaintiffs challenged the confidentiality of the referenced documents on July 7, 2021—a mere two days ago and well outside the ten-day window to meet and confer on any confidentiality challenges if Plaintiffs are using the date the ZHP Parties filed their reply brief. Under your **own** calculations, Plaintiffs' challenges would be untimely.

If the parties are using the date on which Judge Vanaskie issued his order, which would allow the parties to meet and confer and resolve these challenges without resorting to duplicative motion practice, then the ZHP Parties' motion to seal would be due by **July 22, 2021**.

We are deeply concerned about Plaintiffs' decision to refuse to negotiate in good faith over documents the ZHP Parties have designated as confidential, and which the ZHP Parties are willing to meet and confer regarding possible de-designations. Rather than confer in good faith over relatively resolvable issues, Plaintiffs refuse to respond to basic questions, and have chosen to force the ZHP Parties to accept "my way or the highway" negotiations or file duplicative and make-work sealing motions to protect documents properly designated as confidential pursuant to the Protective Order. This is especially concerning given that the ZHP Parties are willing to work with Plaintiffs, and, in fact, **agree** to de-designate documents in light of Judge Vanaskie's order.

In order to resolve this issue practically, we request that both parties agree to preserve their positions, and agree that the deadline for any sealing motion will be **July 22**, with a meet and confer to take place on Monday. If not, we respectfully request that the parties contact Judge Vanaskie's chambers immediately to seek his guidance on this dispute.

Thank you,
Kelly

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Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Friday, July 9, 2021 12:51 PM

To: Bonner, Kelly <KABonner@duanemorris.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Cheryll Calderon <ccalderon@mazieslater.com>

Subject: RE: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen

Counsel,

Plaintiffs have explained their position regarding the confidentiality of this brief and the new exhibits attached thereto. It goes without saying that Plaintiffs are not challenging the confidentiality or lack thereof of documents that the Court has already ruled on in this context, or that ZHP has already waived, as we've previously discussed and are scheduled to brief. There is clearly no need to meet and confer on such documents.

More substantively, Plaintiffs do not see a need to redact any portion of the brief or the three new exhibits, but are willing to meet and confer today or Monday to discuss this further. Plaintiffs note that ZHP filed its reply brief on June 10, 2021 (ECF 1307), so the thirty-day deadline for filing a motion to seal is Monday, given that the thirty days falls on a weekend.

Best,
Chris

From: Bonner, Kelly <KABonner@duanemorris.com>

Sent: Friday, July 9, 2021 10:02 AM

To: Christopher Geddis <CGeddis@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: FW: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen

Counsel,

We dispute your allegations as to both ZHP's valsartan and Mr. Chen as without basis, and your objections as overbroad and non-specific.

Based on your email, we understand that Plaintiffs seek to meet and confer on the following exhibits, as well as Plaintiffs' brief in opposition to the ZHP Parties' Motion for a Protective Order:

1. 5/18/2021 Tr. of Jie (Jay) Wang Dep. 13:10-15:14, Ex. JJ;
2. 5/20/2021 Tr. of Xiaodi Guo Dep. 131:11-140:2, Ex. KK;
3. 5/21/2021 Tr. of Mi (Karen) Xu Dep. 140:3-12, Ex. LL;

As to these three documents, is it Plaintiffs' position that their confidentiality is outweighed by potential public interest in health and safety issues, and that the ZHP Parties will be expected to either agree to their wholesale de-designate, or move to seal? Or would Plaintiffs be amenable to proposed redacted versions of the documents?

We further understand that Plaintiffs will not meet and confer on the following documents on the grounds that Plaintiffs believe that they have been attached to prior filings:

1. ZHP00076700, Ex. A;
2. ZHP00076708-09, Ex. B;
3. ZHP01662344-59, Ex. C;
4. ZHP01633850, Ex. D;
5. ZHP01458548, Ex. E;
6. ZHP00004937, Ex. F;
7. PRINSTON00083647, Ex. G;
8. PRINSTON00083002, Ex. H;
9. PRINSTON00083028, 31, Ex. I;
10. PRINSTON00074128, Ex. J;
11. PRINSTON00081551, Ex. K;
12. PRINSTON00081574, Ex. L;
13. ZHP0000222, Ex. M;
14. ZHP02579748, Ex. N;
15. SOLCO00012089, Ex. O;
16. SOLCO00189499, Ex. P;
17. SOLCO00025179, Ex. Q;
18. SOLCO00033301, Ex. R;
19. SOLCO00181380, Ex. S;
20. SOLCO00180393, Ex. T;
21. PRINSTON00162373, Ex. U;
22. ZHP00494048, Ex. V;
23. ZHP01423197, Ex. W;
24. ZHP00292153, 49, Ex. X;
25. ZHP02666849, Ex. Y;
26. ZHP01224767, Ex. AA;
27. ZHP01761094, Ex. DD
28. ZHP00667853, Ex. EE;
29. PRINSTON00468994, Ex. FF;
30. ZHP02471924, Ex. GG;
31. ZHP02490581, Ex. HH
32. ZHP02385482, Ex. II;

We note that two of these documents—ZHP0000222 and ZHP02579748—were held to be properly designated confidential by Judge Vanaskie's recent order. Consequently, we ask that Plaintiffs identify which documents Plaintiffs believe are not confidential, and thus, not subject to a meet and confer, by virtue of being attached to public filings.

The ZHP Parties are happy to meet and confer in good faith with Plaintiffs regarding the confidentiality of these documents to resolve these issues without resorting to duplicative and needless motion practice. We assume that any motion to seal would need to be filed within thirty (30) days of the completion of the briefing related to the original motion, i.e., by July 22. Consequently, we propose to meet and confer by no later than **Monday, July 12**. Please propose dates and times.

Thank you,
Kelly

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Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Wednesday, July 7, 2021 3:00 PM

To: Bonner, Kelly <KABonner@duanemorris.com>

Cc: Cheryll Calderon <ccalderon@mazieslater.com>

Subject: FW: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen

Hi Kelly,

In light of your recent correspondence regarding ZHP's confidentiality designations, Plaintiffs wish to clarify that given the public's interest in ZHP's contaminated valsartan and Baohua Chen's role in that contamination, Plaintiffs do not agree to the confidentiality of this brief or its exhibits. Plaintiffs believe all the exhibits, except JJ (an excerpt from Jie Wang's deposition), KK (an excerpt from Xiaodi Guo's deposition), and LL (an excerpt from Mi (Karen) Xu's deposition) have been attached to prior filings. Plaintiffs are available to meet and confer on these three new exhibits (and any others not previously filed) as well as the brief itself, to the extent ZHP wishes to keep the material confidential.

Best,
Chris

From: Christopher Geddis

Sent: Monday, June 7, 2021 6:43 PM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; tiv_stevenslee.com
<tiv@stevenslee.com>

Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Hansen, Forrest
<FRHansen@duanemorris.com>; Moriarty, John E. <JEMoriarty@duanemorris.com>; Pugh,
Lauren <LPugh@duanemorris.com>; cct@pietragallo.com; CohenL@gtlaw.com;
jgeoppinger@ulmer.com; SJohnston@btlaw.com; valpec@kirtlandpackard.com;
DECValsartan@btlaw.com

Subject: RE: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to
Preclude the Deposition of President Baohua Chen

Dear Judge Vanaskie:

On behalf of Adam Slater, please see attached for Plaintiffs' Brief Opposing ZHP's Motion for a Protective Order Precluding Baohua Chen's Deposition. The brief and exhibits are all accessible at the following link:

[REDACTED]
If you have any trouble accessing them, please let me know.

Respectfully,
Chris

Christopher J. Geddis
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From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Sent: Monday, May 17, 2021 3:04 PM

To: tiv_stevenslee.com <tiv@stevenslee.com>

Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Hansen, Forrest <FRHansen@duanemorris.com>; Moriarty, John E. <JEMoriarty@duanemorris.com>; Pugh, Lauren <LPugh@duanemorris.com>; cct@pietragallo.com; CohenL@gtlaw.com; jgeoppinger@ulmer.com; SJohnston@btlaw.com; valpec@kirtlandpackard.com

Subject: Valsartan MDL: ZHP Parties' Brief in Support of Motion for Protective Order to Preclude the Deposition of President Baohua Chen

Dear Judge Vanaskie,

Please find attached the ZHP Parties' unredacted brief in support of their motion for protective order precluding the deposition of ZHP President Baohua Chen. Your Honor will also be receiving an e-mail from Forrest Hansen with a link to the Duane Morris secure site, which will contain the confidential and restricted confidential exhibits supporting the motion.

Respectfully,

Seth Goldberg

	
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